

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA

3
4 QUINDA BEESON,
5 Plaintiff,

6 vs. No. CIV-20-327-SLP

7 SAFECO INSURANCE COMPANY OF
8 AMERICA,
9 Defendant.

10
11 VIDEOCONFERENCE DEPOSITION OF BARBARA MEYER
12 Taken on Behalf of the Plaintiff
13 On February 11, 2021, beginning at 9:36 a.m.
14 All Parties Appearing Via Zoom

15 APPEARANCES:

16 Appearing on behalf of the PLAINTIFF

17 Jacob J. Rowe
18 FULMER SILL
19 1101 North Broadway, Suite 102
20 Oklahoma City, Oklahoma 73103
21 (405) 510-0077
22 Jrowe@fulmersill.com

23 Appearing on behalf of the DEFENDANT

24 William W. O'Connor
25 HALL ESTILL
320 South Boston Avenue, Suite 200
Tulsa, Oklahoma 74103-3706
(918) 594-0588
Boconnor@hallestill.com

Reported By: Becky C. Dame, CSR, RPR

1 A There's a copy of the Petition that was
2 filed and the Interrogatory responses that
3 Ms. Beeson provided to us.

4 Q Did the claim file include the discovery
5 responses that Safeco has provided to Ms. Beeson?

6 A I believe that there were, yes, Safeco's
7 answer.

8 Q Okay. We recently have filed some
9 pleadings in regard to a Motion to Compel Additional
10 Discovery. Did you see any of those pleadings in
11 the claim file?

12 A I do not recall seeing that.

13 Q Who's handling Ms. Beeson's claim right
14 now at Safeco?

15 MR. O'CONNOR: Object to the form.

16 BY MR. ROWE:

17 Q I'll ask it a different way.

18 Is there anybody at Safeco that is
19 continuing to handle Ms. Beeson's underinsured
20 motorist claim?

21 A I'm not sure I understand what you're
22 saying, but I am the adjuster on the file. Is that
23 what you're asking?

24 Q Maybe. Are you continuing to handle
25 Ms. Beeson's underinsured motorist claim?

1 A Yes. The claim is still open and I am the
2 control adjuster.

3 Q I'm just making some notes here.

4 What was the last substantive claim note
5 that you made on Mrs. Beeson's file for the open
6 claim that you're still continuing to handle?

7 A Probably -- the last note that I made in
8 the file? Is that what you're asking? Was probably
9 in June of last year.

10 Q What was the substance of that note?

11 A That was just my summarizing the
12 scheduling order that was provided to us, giving us
13 the outline that the case is coming up for trial
14 docket and that sort of thing.

15 MR. O'CONNOR: Hey, Barbara.

16 THE WITNESS: Yeah.

17 MR. O'CONNOR: I don't want you to
18 disclose any communications you've had with counsel.
19 Okay?

20 THE WITNESS: Oh, okay.

21 MR. O'CONNOR: So don't discuss anything
22 that is the product of your communication with any
23 of us or anybody inhouse who's a lawyer.

24 And that's true all day long. We're not
25 going to disclose anything we talked about or